

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
)	
Response Efforts Undertaken During the)	GN Docket No. 17-344
2017 Hurricane Season)	

REPLY COMMENTS OF THE WIRELESS INFRASTRUCTURE ASSOCIATION

The Wireless Infrastructure Association (WIA or association) respectfully submits these reply comments in response to the Federal Communications Commission’s (FCC or Commission) *Public Notice* (PN) seeking comment on the resiliency of the communications infrastructure and industry responses to the 2017 hurricane season in the above captioned proceeding.¹

WIA’s members worked diligently in advance of and following the storms of 2017 to rapidly restore communications infrastructure. A WIA-member survey seeking information on how communications structures were affected by the 2017 storms, found that the underlying wireless tower structures supporting wireless service performed admirably. Specifically, of the 9,330 WIA member-reported wireless towers in the path of hurricanes Harvey, Irma, and Maria, only five towers (0.05%) suffered significant structural damage as a result of the storms.

The wireless industry executed best practices to limit the impact of the 2017 hurricanes on America’s communications networks.² Wireless infrastructure providers worked to ensure

¹ *Public Safety and Homeland Security Bureau Seeks Comment on Response Efforts Undertaken During 2017 Hurricane Season*, Public Notice, DA 17-1180 (rel. Dec. 7, 2017).

² See CTIA Comments at 7-8.

that underlying wireless tower structures were accessible and functional while navigating widespread power outages and flooding.³ For example, American Tower Corporation (American Tower), within 24-48 hours after the hurricanes, conducted visual site inspections of all sites in and near the paths of the hurricanes. In addition, American Tower engaged with its local contractors to quickly identify immediate needs and critical outages at its sites. Immediate fixes included refueling its generators, reestablishing communications with generators that experienced flooding, fixing tower lighting, road clearance (debris and trees) to enable generator refueling and site access so its tenants could mobilize to fix their equipment. Following the storms, American Tower collaborated with other communications tower companies to collectively share information, survey damage to sites and help the carriers restore network service as soon as possible.⁴ When it was safe to travel to the sites, teams were assembled on the ground, and daily meetings were held to assess the ongoing restoration plan.

Similarly, Crown Castle International Corporation (Crown Castle) inspected every site in affected impact zones to ensure clear access as well as assess for damage; refueled and maintained generators where they have ownership and responsibility; performed climbed inspections (as needed) to determine tower integrity and existence of damage; and repaired access roads, compound fencing, towers, and electrical infrastructure. Additionally, Crown Castle assisted the following entities with data and/or resources for recovery communications: Federal Emergency Management Agency, U.S. Army Corp of Engineers, Homeland Security, Secret Service, and Puerto Rico Police.

³ See Verizon Comments at 2.

⁴ T-Mobile reported that “in most areas impacted by the 2017 hurricane season, T-Mobile restored coverage to the areas served prior to the storms within 2-5 days of impact.” T-Mobile Comments at 12.

Insite Wireless Group (Insite Wireless) dispatched crews and personnel to perform site and structure inspections via ground and helicopter and has indicated that most site damage from hurricanes Irma and Maria has been completed. In Puerto Rico, Insite Wireless enabled vital public safety assistance by providing temporary collocation of one of its sites until the police and emergency medical service could rebuild their structure that was damaged.

WIA applauds the Commission's efforts in closely examining the performance of wireless networks during and after the catastrophic weather events of 2017 and looks forward to continuing this important dialogue.

Respectfully submitted,

/s/ D. Zachary Champ

D. Zachary Champ

Director, Government Affairs

Wireless Infrastructure Association

500 Montgomery Street, Suite 500

Alexandria, VA 22314

(703) 739-0300

February 21, 2018